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 6 GREEN LINE ENTERPRISES, INC. and
 JAMES HOLLAND

7
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

11 BARBARA A. WOOD,

12 Plaintiff,

13 vs.

14 THE GREEN LINE ENTERPRISES, INC., JAMES
 15 W. HOLLAND, and DOES 1 through 10, inclusive,

16 Defendants.

Case No.: 3:10-cv-00351JL

**STIPULATION EXTENDING DEADLINE
 FOR MEDIATING AND RESCHEDULING
 CASE MANAGEMENT CONFERENCE;
~~PROPOSED~~ ORDER**

17 The parties, by and through undersigned counsel, agree and stipulate as follows:

18 1. This court had set a deadline for mediating this case by September 21, 2010 and a further
 19 Case Management Conference for November 3, 2010.

20 2. On July 15, 2010, undersigned counsel and the appointed mediator, Thomas HR Denver,
 21 met to plan the mediation. All agreed that certain depositions and an independent medical evaluation of
 22 the plaintiff should be completed before the mediation. Because of scheduling issues, the independent
 23 medical evaluation was delayed and the evaluator unable to prepare a report before September 21, and
 24 the plaintiff's deposition has not been taken. These scheduling issues include the following: plaintiff's
 25 counsel has been in a weeks-long trial that prevented him from participating in his client's deposition in
 26 September; the plaintiff, herself a busy lawyer, has had a number of conflicts in her schedule she was
 27 not able to work around, despite her best efforts; the medical evaluator was not able to schedule the
 28 evaluation before October 1; defense counsel is set to go out to trial in Modesto on October 13 and will

1 be unavailable through October 22.

2 3. The examination was completed on October 1, 2010. The parties need the deposition of
3 plaintiff Barbara Wood to proceed. That deposition is set for Friday, October 8, 2010. On Monday,
4 October 4, 2010, counsel was notified that Sal Sunseri, a local defense counsel who Mr. Brazier worked
5 with for 30 years had suddenly died and that the funeral was set for the same time as plaintiff's
6 deposition in Sacramento. The parties agreed to move the deposition to allow attendance at the funeral.
7 As noted in the preceding paragraph, it will be almost impossible to reschedule the deposition in time to
8 mediate the case effectively on November 3.

9 4. Further, the mediator will be out of town for the month of October and is fully booked for
10 the month of November.

11 5. Therefore the parties agreed to hold the mediation in December.

12 6. The next Case Management Conference is scheduled for November 3, 2010. The parties
13 seek to continue that CMC until January 2011, by which time the matter will have been mediated.

14 For this reason, the parties ask the court to continue the Case Management Conference to a
15 convenient date so that they may complete the mediation.

16 It is so stipulated.

17
18 Dated: October 5, 2010

DREYER BABICH BUCCOLA CALLAHAM &
WOOD, LLP

19
20 By: /s/
CHRISTOPHER A. WOOD
Attorneys for Plaintiff
BARBARA A. WOOD

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22
23
24 Dated: October 5, 2010

LaMORE, BRAZIER, RIDDLE & GIAMPAOLI

25
26 By: /s/
THOMAS S. BRAZIER
Attorneys for Defendants
GREEN LINE ENTERPRISES, INC. and
JAMES W. HOLLAND

~~PROPOSED~~ ORDER CONTINUING DEADLINE FOR MEDIATION AND CONTINUING CASE MANAGEMENT CONFERENCE

The parties' stipulation having come before this court, and good cause appearing, it is hereby ordered that the deadline for mediating this case shall be extended to December 31, 2010.

Further, it is ordered that the next Case Management Conference shall be set on January 19, 2011 at 10:30 a.m. in Courtroom F.

IT IS SO ORDERED.

Date: October 19, 2010



UNITED STATES MAGISTRATE JUDGE